

1 than Nice and Paris?

2 A. I went to a place called -- I am going to butcher it.
3 It's like Marce. I went there to get my visa to go to
4 Egypt. And I visited a town called Leon. And I think
5 another town farther out to see some mountains. And I
6 think that was about it.

7 Q. While you were in France, my understanding is you
8 went hiking on many occasions; is that correct?

9 A. Monton was a pretty small town, but it had some nice
10 hikes in the area, so I went hiking.

11 Q. And fairly often, correct?

12 A. Yeah, probably once a month.

13 Q. You had your deposition taken, do you remember,
14 Emily, in this case?

15 A. My deposition? I remember I gave a deposition.

16 Q. Did you have a chance to look at it before you came
17 in yesterday to court?

18 A. Yes, I reviewed it before.

19 Q. And do you recall testifying that you took about
20 twelve hikes while you were in France? Does that sound
21 about right?

22 A. Probably, yeah.

23 Q. And were these hikes in different parts of France or
24 the same town?

25 A. Mainly just around Monton, yeah.

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1 Q. And how would you get to that town?

2 A. How would I get to Monton?

3 Q. Is that the town you were living in?

4 A. That's where I was living, yeah.

5 Q. I'm sorry. I apologize. So I understand from
6 yesterday's testimony you also traveled to London; is that
7 correct?

8 A. Yes.

9 Q. How did you get to London, by train or by plane?

10 A. By plane.

11 Q. And how long did you stay in London?

12 A. When I was there with Hanna, I think we were there
13 maybe a week, maybe a week and a half.

14 Q. Do I take it by that answer there were other times
15 you were in London?

16 A. I came there once for basically a two-day trip. It
17 was a very short period of time, two, three days. That
18 was about it.

19 Q. Were you with someone or by yourself?

20 A. I was by myself.

21 Q. And how did you get there?

22 A. I took a plane.

23 Q. And was that pleasure or something related to school?

24 A. No, I just wanted to kind of see London.

25 Q. And the first trip to London -- the trip to see Hanna

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1 was obviously pleasure, too, to see a friend, correct?

2 A. Yes. Correct.

3 Q. Did you have the opportunity while you were doing
4 your term abroad to visit any other countries?

5 A. Yes.

6 Q. Where else did you visit?

7 A. I did take a fall trip with two people I had met at
8 the university. We went to kind of the Balkan countries,
9 because the U.S. dollar was strong there. So I think I
10 visited -- I visited Sarajevo, which is in Bosnia. And
11 then I visited -- we kind of went through Croatia and into
12 Slovenia.

13 Q. How did you get to those countries, and how did you
14 get from one of those countries to the next?

15 A. Well, first we flew into Bosnia, and then we took
16 buses and occasionally trains to get from one place to
17 another.

18 Q. And for how long did you -- I just went blank. I
19 apologize. For how long were you visiting the Balkan
20 countries?

21 A. It was about one week, I think.

22 Q. Okay. And you said this was in the fall of 2018?

23 A. Correct.

24 Q. Anywhere else that you visited while you were doing
25 your term in France?

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1 **A.** I was lucky enough to receive kind of a scholarship
2 to do some research, just like a small project in Turkey.
3 You had to apply for it. And they help subsidize your
4 plane ticket. So I was in Istanbul for about one week.

5 **Q.** You said you flew to Istanbul?

6 **A.** Correct.

7 **Q.** Did you enjoy Istanbul?

8 **A.** I was there for research.

9 **Q.** Were you able to see any of the city while you were
10 there for a week?

11 **A.** I was kind of conducting interviews with people, so I
12 saw where they were living. That was nice.

13 **Q.** Anywhere else that you visited while you were in
14 France?

15 **A.** To the best of my knowledge, no.

16 **Q.** Did you go to any other parts of Italy, for example?

17 **A.** I took my flight to Cairo from the Milan airport,
18 because it was cheaper, so I passed through there.

19 **Q.** Did you spend any time in Milan?

20 **A.** No.

21 **Q.** Did you visit Germany or any other European countries
22 while you were over there?

23 **A.** That is correct, I did go to Germany at the end of my
24 time. It was in May.

25 **Q.** Where in Germany did you go?

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1 A. I went to what is this -- I think I flew into
2 Wachendorf, and then I visited someone I knew who had been
3 a nanny in Seattle in a small town in Germany,
4 Monchengladbach.

5 Q. You spent a week there, you said, or two weeks? How
6 long did you spend there?

7 A. I think in total it was about a week.

8 Q. Were you able to go to Spain, Portugal?

9 A. No.

10 Q. How about Switzerland or anything like that?

11 A. No.

12 Q. So at some point after you completed your studies and
13 your traveling while you were in France, you next went to
14 Cairo; is that correct?

15 A. Yes, in I think the end of may. I went to Cairo at
16 the end of my academic year.

17 Q. Just so the jury knows, what amount of time did you
18 actually spend in that town, which I cannot pronounce, I
19 apologize, in France? How much time did you spend there?

20 A. So I was there from September to May, so September,
21 October, November, December, January, February, March,
22 April, May. So about nine months.

23 Q. About nine months. Okay. Do I understand it when
24 you went -- had you been to Cairo -- I apologize, Barry.
25 I will withdraw that.

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1 Had you been to Cairo before this trip to Cairo in
2 2019?

3 A. Before I left in May, I had gone there -- basically,
4 kind of a school trip to do a group class study at a
5 language institute in Cairo. It was organized through the
6 university, and there was a discount on group classes at
7 that school. So I went with several other students from
8 that university to study at the language institute for
9 about -- in total about three weeks, I believe, on our
10 winter break.

11 Q. I am a little slow on the uptake. Just so I
12 understand, you visited Cairo for three weeks while you
13 were doing your semester -- your term abroad in France; is
14 that correct?

15 A. While I was on my exchange year in France, I took my
16 winter break -- instead of taking a vacation, I went and
17 enrolled in classes at the language institute in Cairo.

18 Q. You went with a couple of other students, you said?

19 A. It was a group discount. So if there were enough
20 students willing to go, we were able to enroll in a class
21 together.

22 Q. So when you went to Cairo in 2019, you had at least
23 been there once before for those three weeks, correct?

24 A. Correct.

25 Q. And do I understand when you were in Cairo, you were

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1 living with a family?

2 A. Which time? The summer?

3 Q. I apologize. You are absolutely right. In 2019, I'm
4 sorry.

5 A. Yes. In the summer of 2019, I was -- in exchange for
6 room and board, I was an at-home tutor for an Egyptian
7 family. I tutored their children in English.

8 Q. I may have asked this. If I did, I apologize. What
9 was the time frame you were in Cairo in 2019?

10 A. I believe I arrived at the very end of May, and I
11 left at the very end of September.

12 Q. So about four months?

13 A. Yeah.

14 Q. And this was not for school credits, this was -- you
15 wanted to go to Cairo, correct?

16 A. I went there to learn Arabic.

17 Q. You were living -- did you know this family that you
18 lived with before you lived with them?

19 A. Not really.

20 Q. And they had -- do I understand they had two teenage
21 kids that you were teaching, or am I wrong about that?

22 A. They had a very sweet 13-year-old daughter, a
23 16-year-old son who was studying for the SATs, they had
24 two sons enrolled in college.

25 Q. I apologize. Were they Americans living in Cairo or

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1 were they Egyptians?

2 A. They were Egyptians.

3 Q. And my understanding from one of your articles that
4 you have written, upon arrival in Cairo you founded -- I
5 believe the word you called it, unmatched exhilaration; is
6 that correct?

7 A. I have never really seen a desert before. So when I
8 saw it, I thought I was -- it was pretty spectacular.

9 Q. And you actually -- just so the jury understands, you
10 actually wrote an article about your time in Cairo, and
11 would it be fair to say, your love of Cairo?

12 A. My friend, she does a magazine called UW Voyage for
13 the University of Washington, and they were doing a piece
14 on people who had done exchanges abroad. She asked me to
15 write about my experience, with a focus on sustainability.

16 So I wrote this article for them. I also submitted
17 it to this kind of online organization, which I'm sure is
18 how you found it.

19 Q. And when you submitted -- and the article was about
20 Cairo, correct?

21 A. Correct.

22 Q. And when you say "sustainability," what does that
23 mean?

24 A. To be honest, Cairo is kind of a trash heap.

25 Q. There is a lot of garbage, I guess, is that the right

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1 word?

2 A. They have a problem with littering, with garbage,
3 with disposing of trash.

4 Q. Was one of your articles about the need to -- plans
5 to clean up the city?

6 A. No.

7 Q. What was the article about?

8 MR. PETRU: Objection. Relevance, your Honor.

9 THE COURT: Overruled.

10 THE WITNESS: I wrote mainly about -- it is
11 sad -- okay. There is a group of people living in Cairo
12 who collect the trash. They find trash in the streets.
13 They live in a trash heap, and they grind down the
14 different types of trash, and they compact it, and they
15 sell it to make a living. This is their waste disposal
16 system.

17 BY MR. BONVENTRE:

18 Q. You were commenting upon that in the article,
19 correct?

20 A. Correct.

21 Q. But I believe the conclusion of the article was
22 something to the effect of, don't just judge Cairo by
23 that, it is actually wonderful in many other ways,
24 correct?

25 A. Correct.

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1 Q. While you were in Cairo, my understanding is you did
2 take the train in the city; is that correct?

3 A. Occasionally, yes.

4 Q. And I believe you described it in your deposition as
5 an old metro system, correct?

6 A. It is very old.

7 Q. Were you able -- did you have the opportunity to
8 travel within Egypt during that period in 2019 that you
9 were in Cairo?

10 A. No.

11 Q. When did you come back to the United States?

12 A. In September of 2019.

13 Q. And that's when you resumed your studies at the
14 University of Washington, correct?

15 A. Correct.

16 Q. You went back to Cairo where you are currently living
17 in 2021, correct, last year?

18 A. Correct.

19 Q. When did you -- do you have a more specific date in
20 2021?

21 A. In June of 2021.

22 Q. And you are still residing there now, correct?

23 A. Correct.

24 Q. Prior to going to Cairo, did you visit another
25 country?

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1 A. Correct.

2 Q. And was that Romania?

3 A. Correct.

4 Q. And because I'm horrible with geography, where is
5 Romania compared to Egypt?

6 A. Me too. I don't know. I know it's in Europe.

7 Q. Is Romania in Eastern Europe?

8 A. Yeah.

9 Q. I take it you obviously flew from Seattle to Romania?

10 A. Correct.

11 Q. How long did you stay in Romania? For about a month,
12 correct?

13 A. A few weeks, yes.

14 Q. The trip to Romania was for pleasure? You wanted to
15 see Romania, correct?

16 A. Correct.

17 Q. By the way, were you alone or were you traveling with
18 anyone?

19 A. I was traveling -- there was someone I knew from
20 Sciences Po. And we had stayed in touch throughout COVID.
21 So I asked if it would be possible to see Romania, and
22 they said, sure.

23 Q. And did you travel around Romania?

24 A. We visited a few different areas, kind of the tourist
25 sites, Dracula's castle.

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1 Q. What areas did you visit?

2 A. We visited an area that is very foresty. It has the
3 Dracula castle, and then another area along the coastline.

4 Q. Was it a good time?

5 A. It was nice.

6 Q. And then from Romania you went back to Cairo,
7 correct?

8 A. I hadn't -- yes. The purpose was to go to Cairo.
9 The first stop was Romania, and then went to Cairo.

10 Q. And other than for this trial, have you been back to
11 the United States since you went to Cairo in 2021?

12 A. No.

13 Q. Have you -- have you taken the old metro in Cairo
14 since you returned in 2021?

15 A. Initially, I was living in an area that was kind of
16 in the middle of the city. So in order to go to work, I
17 had to take the metro.

18 Q. Have you had the opportunity to travel within Egypt
19 since you have been to Cairo in 2021?

20 A. No.

21 Q. Have you traveled anywhere else while you have been
22 in Cairo, Egypt?

23 A. No.

24 Q. Thank you. Just briefly on the issue of -- I know
25 you told us about when you would take a train in Europe

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1 and Egypt and everything. When you have been back in the
2 United States, particularly when you were back in Seattle
3 at school, you were taking buses and the Link, correct?

4 A. I took buses. I avoided the Link at all costs.

5 Q. You did take it from time to time; is that fair to
6 say?

7 A. Probably total two times, three times.

8 Q. Emily, can you see what is marked A41?

9 A. Yes.

10 Q. Is that your LinkedIn?

11 A. Yes.

12 Q. Could you tell the members of the jury what LinkedIn
13 is? I know what it is, but not very well. Others may
14 not. What is LinkedIn?

15 A. It is a professional platform for finding a job.

16 Q. And you fill it out, or whatever the right word is,
17 you populate it with information; is that correct?

18 A. It is basically your CV.

19 Q. You are the one who puts the information in?

20 A. Correct.

21 Q. So is this your LinkedIn -- is that called a page?
22 LinkedIn page? Is that what it would be called?

23 A. Yes.

24 MR. BONVENTRE: I offer into evidence A41, your
25 Honor.

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1 MR. PETRU: No objection.

2 THE COURT: A41 is admitted and may be published.

3 (Exhibit No. A41 admitted.)

4 BY MR. BONVENTRE:

5 Q. So, Emily, I just want to go over your CV as you
6 called it and some of your experiences, okay?

7 A. Okay.

8 Q. You don't need a break or anything, do you?

9 A. I'm fine.

10 Q. You're fine.

11 MR. PETRU: Is that a question?

12 MR. BONVENTRE: I apologize, Judge. I'm sorry.

13 BY MR. BONVENTRE:

14 Q. The first thing is your experience, and it says that
15 you are partly working full time at Geek Lab Holdings or
16 Labs Holdings; is that correct?

17 A. Correct.

18 Q. That's your current provider in Cairo, correct?

19 A. Correct.

20 Q. And you are the chief executive officer, correct?

21 A. Correct.

22 Q. And that was from September -- you became the CEO in
23 September of last year, correct?

24 A. Correct.

25 Q. And you said you have about four people reporting to

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1 you?

2 A. Yeah.

3 Q. Was there a time when it was six?

4 A. We have a lot of turnover, yeah.

5 Q. And prior to that, you were a content writer,
6 correct?

7 A. Correct.

8 Q. Meaning you would write articles?

9 A. I would create content, correct.

10 Q. And are you familiar with something called the Night
11 Beyond?

12 A. This was one of their brands, platforms.

13 Q. You actually wrote some, as you say, content for the
14 Night Beyond, correct?

15 A. Correct.

16 Q. Let me ask you this: Would it be fair to say many of
17 the articles that you wrote were about serious substantive
18 conversations -- topics. The material in the Night Beyond
19 was a little less -- a little more cultural, would that be
20 fair to say, sort of American culture?

21 A. I wrote what I was told to write.

22 Q. Was one of the things you were told to write was an
23 article about ten movie sequels that ruined the original?

24 A. I believe that was one of the requested topics.

25 Q. And in July of 2021 -- actually, let me step back for

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1 a second. I apologize. The article that you wrote about
2 Cairo, did that article -- and was published -- did that
3 article include photographs you had taken in Cairo?

4 MR. PETRU: Objection. Relevance, your Honor.

5 THE COURT: Overruled.

6 THE WITNESS: I believe the one I had done for --
7 when I originally submitted it to the UW Voyage magazine,
8 I included some photos I had taken.

9 BY MR. BONVENTRE:

10 Q. Thank you. I didn't mean to jump around like that.
11 I apologize. So you did write -- one of the things you
12 wrote for the Night Beyond was "Ten Movie Sequels That
13 Ruined the Original," correct?

14 A. Correct.

15 Q. And this was on July 20th of 2021?

16 A. I have no idea.

17 Q. Can you switch to A36 just for Emily? Emily, do you
18 see Defendant's A36?

19 A. Yeah.

20 Q. And is that the article that you wrote, "Ten Movie
21 Sequels that Ruined the Original"?

22 A. Yeah.

23 Q. And that's July 20th, 2021?

24 A. Yeah.

25 Q. And did you pick those movies?

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1 MR. PETRU: Objection. Relevance, your Honor.

2 THE COURT: Overruled.

3 THE WITNESS: Yeah. They kind of just said this
4 is the topic. And to be honest, I have never watched most
5 of these movies.

6 BY MR. BONVENTRE:

7 Q. Did you write this article?

8 A. Yeah.

9 MR. BONVENTRE: Judge, I would offer A36 into
10 evidence.

11 MR. PETRU: Objection, your Honor. Relevance.
12 We discussed this previously. It's 41 pages, your Honor.

13 THE WITNESS: How is it 41 pages? I wrote a very
14 short article.

15 MR. PETRU: I'm just objecting.

16 MR. BONVENTRE: Judge, respectfully, it is her
17 work that she published.

18 THE COURT: I think you can ask about it, but we
19 are not going to have it in evidence.

20 MR. BONVENTRE: All right, sir. That's fine.
21 Thank you, your Honor.

22 BY MR. BONVENTRE:

23 Q. Could you go to the last page of that article,
24 Page 11? So that article was eleven pages long, or ten
25 and a half pages; is that fair to say, Emily?

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1 **A.** Huh?

2 **Q.** You said 41 pages. It is actually ten and a half
3 pages long, correct?

4 **A.** I see. This is a culmination -- I see.

5 **Q.** Is that correct, this article is about ten and a half
6 pages?

7 **A.** I guess, yes, is it.

8 **Q.** Would you say that this was sort of lighter fare than
9 what you were doing in some of your articles, would that
10 be fair to say, articles about Yemen or Cairo?

11 **A.** I didn't choose the topic.

12 **Q.** I understand that. Would this be lighter fare than
13 the other articles you wrote?

14 **A.** Yeah, it is about movies.

15 **Q.** And then one of the other articles you wrote for the
16 Night Beyond -- the next page, was "Eight Refreshing Foods
17 to Beat the Heat and Keep You Hydrated"; is that correct?

18 **A.** Yes.

19 **Q.** And you picked a bunch of foods that you thought
20 people might like to eat when it is hot and dry?

21 **A.** I looked online and found foods and vegetables with
22 the highest concentration with water.

23 **Q.** And you wrote a nine-page article; is that fair to
24 say?

25 **A.** Including photos, yes.

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